

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JACKSONVILLE POLICE AND FIRE  
PENSION FUND, on behalf of itself and  
all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN SULLIVAN,  
STEVEN BENSINGER, JOSEPH  
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-4772

Hon. Richard J. Sullivan

**THE CITY OF SAGINAW POLICE  
AND FIRE PENSION BOARD'S  
MOTION FOR CONSOLIDATION  
OF ALL RELATED ACTIONS,  
APPOINTMENT OF LEAD  
PLAINTIFF, AND APPROVAL OF ITS  
SELECTION OF LEAD COUNSEL**

JAMES CONNOLLY, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN J. SULLIVAN,  
STEVEN J. BENSINGER, JOSEPH J.  
CASSANO, ROBERT E. LEWIS, and  
DAVID L. HERZOG,

Defendants.

CIV. NO. 08-CV-5072

Hon. Richard J. Sullivan

MAINE PUBLIC EMPLOYEES  
RETIREMENT SYSTEM, on behalf of  
itself and all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN SULLIVAN,  
STEVEN BENSINGER, JOSEPH  
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5464

Hon. Richard J. Sullivan

ONTARIO TEACHERS' PENSION PLAN  
BOARD, on behalf of itself and all others  
similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL  
GROUP, INC., MARTIN SULLIVAN,  
STEVEN BENSINGER, JOSEPH  
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5560

Hon. Richard J. Sullivan

**THE CITY OF SAGINAW POLICE AND FIRE PENSION BOARD'S MOTION  
FOR CONSOLIDATION OF ALL RELATED ACTIONS, APPOINTMENT AS  
LEAD PLAINTIFF AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

**TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

PLEASE TAKE NOTICE that the City of Saginaw Police and Fire Pension Board (“SPFPB”) will and hereby does move this Court on a date and at such time as may be designated by the Court, for an order: (i) consolidating all related actions; (ii) appointing the SPFPB as the Lead Plaintiff in the consolidated action and any subsequently filed related cases, and (iii) approving its selection of Lockridge Grindal Nauen P.L.L.P. and Mager & Goldstein LLP to represent it as Co-Lead Counsel. In support of this Motion, the City of Saginaw Police and Fire Pension Board submits the accompanying memorandum of law and the Affidavit of Lisa M. Pollard.

DATED: July 21, 2008

Respectfully Submitted,

**/s/ Lisa M. Pollard**

Lisa M. Pollard

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**[Proposed] Co-Lead Counsel**